

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF
EMANUEL KATAEV, ESQ. AS TO
SERVICE IN ACCORDANCE
WITH THE ORDER OF THE
HON. JAMES R. CHO, U.S.M.J.
DATED APRIL 18, 2025**

-----X

Emanuel Kataev, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Sage Legal LLC,
who – together with Milman Labuda Law Group PLLC – are the attorneys for the Plaintiff IME
WatchDog, Inc. (hereinafter “Plaintiff” or “IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein
based upon my personal knowledge and a review of the file maintained by this office.

3. On Friday, April 18, 2025, I forwarded a copy of this Court’s Order of the same
date to Karen H. Charrington, Esq. (“Ms. Charrington”) via email to
kcharrington@charringtonlawfirm.com. A copy of the email is annexed hereto as **Exhibit “A.”**

4. Plaintiff also respectfully notes that Ms. Charrington is a recipient of all ECF
bounces on this case and, as such, the separate service of Orders should not be required. See
Fed. R. Civ. P. 5(b)(2)(E) (permitting service by “sending it to a registered user by filing it with
the court's electronic-filing system”).

I declare under penalty of perjury that the foregoing is true and correct. Executed on
April 18, 2025.

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.

Emanuel Kataev

From: Karen Charrington <kcharrington@charringtonlawfirm.com>
Sent: Friday, April 18, 2025 1:21 PM
To: Emanuel Kataev
Cc: Jamie Felsen
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Yes I will accept. **FRE 408**

[REDACTED]

Best Regards,
Karen H. Charrington, Esq.
THE CHARRINGTON FIRM, P.C.
One Cross Island Plaza
Suite 229
Rosedale, New York 11422
718-528-4422
Fax 718-528-4420

On Fri, Apr 18, 2025 at 1:02 PM Emanuel Kataev <emanuel@sagelegal.nyc> wrote:

Karen:

Please confirm you will accept service of the below Order via email on behalf of IME Legal Reps and Eugene Liddie.

Thanks,



Emanuel Kat

ADMITTED IN NEW YORK,
NEW JERSEY,
AND CONNECTICUT



(718) 412-2421 (office)
(718) 489-4155 (facsimile)
(917) 807-7819 (cellular)



emanuel@sagelegal.nyc



1411 Broadway, 29th Floor
New York, NY 10018-1976



173 54th Street
Brooklyn, NY 11220-2505



45 Glen (
Greenvale



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U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 4/18/2025 at 12:59 PM EDT and filed on 4/18/2025

Case Name: IME WatchDog, Inc. v. Gelardi et al

Case Number: [1:22-cv-01032-PKC-JRC](#)

Filer:

Document Number: No document attached

Docket Text:

ORDER: The Court grants the motion [458] by Eugene Liddie (Liddie) and IME LegalReps (IMELR) for an extension of time of the Court's 4/8/2025 Order until 4/25/2025 to provide plaintiffs with a declaration confirming that no other bank accounts exist and supplementing the sales summary previously provided. By 4/22/2025, plaintiff shall serve IMELR with a copy of this Order and file proof of service on ECF. Ordered by Magistrate Judge James R. Cho on 4/18/2025. (SGC)

1:22-cv-01032-PKC-JRC Notice has been electronically mailed to:

Steven Siegler steven@kilegal.com, karen@kilegal.com, samantha@kilegal.com, ssiegler123@gmail.com

Anthony Joseph Genovesi agenovesi@abramslaw.com, anthony@genovesi.us

Jonathon D. Warner jdwarner@warnerandscheuerman.com, diana@warnerandscheuerman.com, kescheuerman@warnerandscheuerman.com, melanie@warnerandscheuerman.com

Jamie Scott Felsen jamiefelsen@mmmlaborlaw.com

Melanie I. Wiener mwiener@abramslaw.com

Karen Hillary Charrington kcharrington@charringtonlawfirm.com

Kenneth C. Brown kcb@alberlegal.com

James Francis Valentino james@valentinolegal.com, valentino@clayro.com,
valentino.james@gmail.com

Emanuel Kataev emanuel@sagelegal.nyc, 4119461420@filings.docketbird.com,
daniellalevi@levilawny.com, ekesq2014@recap.email

Alan Smikun smikunlaw@gmail.com

Maria Zieher mzieher@zieherlaw.com

Eric Allen eric@allenlawyer.com

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